

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)**

**Case No. 3:23-MD-3071
MDL No. 3071**

**This Document Relates to:
3:23-cv-00330 (M.D. Tenn.)
3:23-cv-00333 (M.D. Tenn.)
3:23-cv-00337 (M.D. Tenn.)
3:23-cv-00339 (M.D. Tenn.)
3:23-cv-00387 (M.D. Tenn.)
3:23-cv-00389 (M.D. Tenn.)
3:23-cv-00414 (M.D. Tenn.)**

Chief Judge Waverly D. Crenshaw, Jr.

**BH MANAGEMENT SERVICES, LLC'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION**

Defendant BH Management Services, LLC ("BH") is not subject to personal jurisdiction in the Western District of Washington. Therefore, under Federal Rule of Civil Procedure 12(b)(2), BH moves this Court to dismiss BH from the seven complaints originally filed in the Western District of Washington that are now consolidated in this Court for pretrial proceedings.¹

¹ The actions were originally filed in the Western District of Washington as *Morgan v. RealPage, Inc.*, 2:22-cv-01712 (W.D. Wash.); *Armas v. RealPage, Inc.*, 2:22-cv-01726 (W.D. Wash.); *Pham v. RealPage, Inc.*, 2:22-cv-01744 (W.D. Wash.); *Moore v. RealPage, Inc.*, 2:22-cv-01826 (W.D. Wash.); *Crook v. RealPage, Inc.*, 2:23-cv-00054 (W.D. Wash.); *Kramer v. RealPage, Inc.*, 2:23-cv-00198 (W.D. Wash.); and *Weller v. RealPage, Inc.*, 2:23-cv-00548 (W.D. Wash.). BH was also named in an action originally filed as *Navarro v. RealPage, Inc.*, 2:22-cv-01552 (W.D. Wash.), which was consolidated in this Court under case number 3:23-cv-00329 (M.D. Tenn.). That case has since been voluntarily dismissed. *See* Dkt. 308.

This Motion is based on the accompanying Memorandum of Law, the Declaration of Brandy Daniel, and any additional submissions and argument presented at or before a hearing or ruling on this Motion.

Respectfully submitted,

/s/ Ian Simmons

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CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered on the CM/ECF system.

DATED: July 7, 2023

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